

Exhibit E

From: [Lollar, Tirzah](#)
To: [Raymond Winter](#); [Andrew Stephens](#); [Martin, Meghan C.](#)
Cc: [Eugenia Krieg](#); [Drew Wright](#); [Sinty Chandy](#); [Christopher Hilton](#); [Amy Hilton](#); [Benjamin Walton](#); [Heather Hacker](#); [Sheehan, Christian](#); [Odell, Christopher M.](#); [Margolis, Craig D.](#); [zzz.External.lgodesky@omm.com](#); [brown@blackburnbrownlaw.com](#); [zzz.External.jchapa@omm.com](#); [Michael Moore](#); [zzz.External.dashby@omm.com](#); [Weberman, Melissa L.](#)
Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al
Date: Friday, September 23, 2022 5:00:07 PM
Attachments: [image001.png](#)

Ray:

Thanks for the information, which we are reviewing. Just to confirm, we are not aware of Texas having produced any custodial documents yet, but of course let me know if we are mistaken. Do you anticipate beginning your production of custodial documents next week?

Thanks,
Tirzah

Tirzah Lollar

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From: Raymond Winter <Raymond.Winter@oag.texas.gov>

Sent: Friday, September 23, 2022 4:47 PM

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Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Dear Tirzah,

As requested, here is an update on Texas production to defendants:

- We anticipate making additional rolling production to defendants next week and making further rolling productions in subsequent weeks. I do not currently have an estimate for you as to when our rolling production will be complete. However, we are mindful of the deadlines in the Court's scheduling order.
- We anticipate providing supplemental responses to defendants' discovery requests – including verified interrogatory responses – next week.

As always, let me know if there is anything you wish to discuss.

Best,

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